



**Livestock and Seed Program  
Audit, Review, and Compliance Branch  
Quality System Audit Report**

**AUDIT INFORMATION**

<b>Applicant Name:</b>	Global Organic Alliance (GOA)
<b>Est. Number:</b>	N/A
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<b>Phone Number:</b>	937.593.1232
<b>Auditor(s):</b>	Vickie Robertson, Lead Auditor; Alan Kohles, Auditor; and David Hildreth, Auditor
<b>Program:</b>	USDA National Organic Program (NOP)
<b>Audit Date(s):</b>	January 25 - May 17, 2007
<b>Audit Identifier:</b>	NP7025GGA
<b>Action Required:</b>	Yes
<b>Audit Type:</b>	Surveillance - Accreditation Renewal Audit
<b>Audit Objective:</b>	To verify continuing compliance to the audit criteria
<b>Audit Criteria:</b>	7 CFR Part 205, National Organic Program; Final Rule, dated December 21, 2000; and Updated September 11, 2006
<b>Audit Scope:</b>	GOA's quality manual dated December 27, 2006, including personnel, processes, procedures, facilities, and related records.
<b>Location(s) Audited:</b>	Main office in Bellefontaine, OH; Golden Heritage Foods, Hillsboro, KS; Samuel King Farm in Kinzer, PA; and Buttercup Farm in Butler, OH

Global Organic Alliance Inc. (GOA) was accredited as a certifying agent on April 29, 2002 to the USDA National Organic Program (NOP) to certify operations for crops, wild crops, livestock, and handler/processor. GOA currently certifies 483 clients of which 247 are crops, 62 are processors/handlers, 172 are livestock and 2 are wild crop operations. GOA conducts certification activities in most of the continental United States, Canada and the Philippines.

The 5 Year Accreditation Audit process started on January 25, 2007 with a review of the documents submitted by GOA and concluded with the on-site surveillance audit which was conducted on May 14 – 17, 2007.

All staff, inspectors, and certification personnel are qualified for the duties assigned per personnel files reviewed, client files reviewed, and interviews of personnel. All certification personnel, staff and inspectors had current conflict of interest, resumes, confidentiality agreements, evaluations, and training records. GOA has not denied certification, but has had cause to suspend the certification of two clients



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following the correct procedures. No appeals of certification decisions or mediation have been conducted by GOA as of the present time.

The organization of the certification procedure for GOA has been revised. The Chapter offices no longer perform any certification functions. The initial review of applications is now performed by the certification coordinator at the main office, who also performs the review for the ability of clients to comply. The certification coordinator then assigns a contracted inspector for the inspection. The completed inspection report and related certification documents are reviewed by the Certification Director who makes the final certification decision. Certificates that are signed by the CEO are issued to complying operations.

All required reports and annual updates have been submitted to the USDA within the time lines required by the National Organic Program Final Rule, and all previous non-compliances identified in previous reports have been addressed and cleared.

### **FINDINGS**

Observations made, interviews conducted, and procedures and records reviewed verified that GOA is currently operating in compliance to the audit criteria except as noted in the non-compliances below. Six non-compliances were identified during the audit.

**NP7025GGA.NC1** – NOP §205.204(a)(1) states, “The producer must use organically grown seeds, annual seedlings, and planting stock: *Except*, That nonorganically produced, untreated seeds and planting stock may be used to produce an organic crop when the equivalent organically produced variety is not commercially available.” *GOA is not performing an adequate verification of attempts to procure organically produced seed by producers as evidenced in two of eight client files reviewed.*

**NP7025GGA.NC2** – NOP §205.236(a)(2)(i) states, “Livestock products that are to be sold labeled or represented as organic must be from livestock under continuous organic management from the last third of gestation or hatching: *Except*, That: *Dairy animals*. Milk or milk products must be from animals that have been under continuous organic management beginning no later than 1 year prior to the production of the milk or milk products that are to be sold, labeled or represented as organic.” *One of two livestock files reviewed revealed that six purchased conventional cows were assigned the date of October 1, 2006 as the date beginning the 1 year of continuous management; however, the decision for the date was not based on objective evidence per the information contained in the file.*

**NP7025GGA.NC3** – NOP §205.406(d) states, “If the certifying agent determines that the certified operation is complying with the Act and the regulations in this part and that any of the information specified on the certificate of organic operation has changed, the certifying agent must issue an updated certificate of organic operation pursuant to 205.404(b).” *GOA does not issue revised certificates. The certificates have a certificate effective date and last inspection date, but do not reflect any changes of the information specified on the certificate.*



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**NP7025GGA.NC4** – NOP §205.402 (a)(1) states, “Upon acceptance of an application for certification, a certifying agent must: Review the application to ensure completeness pursuant to 205.401.” *The review of two of eight files revealed that the organic system plans (OSP) were incomplete. One operation was a new poultry applicant and the OSP did not provide the production information such as anticipated capacity, feed purchase/supplier, etc.*

**NP7025GGA.NC5** – NOP §205.642 states, “...The certifying agent shall provide each applicant with an estimate of the total cost of certification and an estimate of the annual cost of updating the certification.” *GOA does not currently provide an estimate for the cost of certification or for the annual cost of updating the certification.*

**NP7025GGA.NC6** – NOP §205.670(b) states, “The Administrator, applicable State organic program’s governing State official, or the certifying agent may require pre-harvest or post-harvest testing of any agricultural input used or agricultural product to be sold, labeled, or represented as “100 percent organic,” “organic,” or “made with organic (specified ingredients or food groups(s))” when there is reason to believe that the agricultural input or product has come into contact with a prohibited substance or has been produced using excluded methods. Such tests must be conducted by the applicable State organic program’s governing State official or the certifying agent at the official’s or certifying agent’s own expense.” *GOA’s policies and procedures do not clearly document that the certifying agent will perform the testing at the certifying agent’s expense.*